

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

April 23, 2003

Mr. Roy Schepens Office of River Protection United States Department of Energy P. O. Box 450, MSIN: H6-60 Richland, Washington 99352

Mr. Ron Naventi Bechtel National Incorporated 2435 Stevens Center Place Richland, Washington 99352

Dear Messrs. Schepens and Naventi:

Re: Completion of inspection of hazardous waste accumulation areas

On April 8, 2003, the Washington State Department of Ecology (Ecology) conducted an inspection of hazardous waste accumulation areas at selected facilities throughout the Hanford Site. Facilities inspected included the following:

- 2025E waste accumulation areas operated by Fluor Hanford Incorporated (FH).
- 331 Building and 3720 Building Laboratories operated by Pacific Northwest National Laboratories (PNNL).
- 100N waste accumulation areas operated by Bechtel Hanford Incorporated (BHI).
- 209E waste accumulation area operated by CH2M Hill Hanford Group (CHG).
- Waste Treatment Plant waste accumulation areas operated by Bechtel National Incorporated (BNI).

No violations were revealed at the BNI facilities inspected, and Ecology considers the inspection closed; however, one concern was noted as follows:



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A waste stream composed of welding accessories generated at the Waste Treatment Plant construction site was "conservatively" designated by process knowledge without any confirmatory analytical data. The process knowledge used to designate the waste contained discrepancies regarding chemical constituents of the waste and constituent concentrations that were reported for the waste. No comprehensive description of the material was available from which to determine if all chemical constituents were accounted for.

Ecology issues "concerns" as a means of notifying facilities of waste management practices that, if not addressed in a timely manner, could evolve into violations of regulatory requirements. In this case, Ecology recommends that this waste stream be tested to ensure all constituents in the waste subject to regulation are adequately designated.

If you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,

Bob Wilson

Compliance Specialist

Rob Willow

Nuclear Waste Program

BW:nc

CC:

Jean Quigley, CHG

Chris Strand, BNI

Todd Martin, HAB

Rick Gay, CTUIR

Pat Sobotta, NPT

Russell Jim, YN

Ken Niles, OOE

Administrative Record